

Before the
Federal Communications Commission
Washington D.C. 20554

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In the Matter of

Amendment of Section 73. 202(b) Table of Allotments, FM Broadcast Stations.

(Connersville, Madison, and Richmond, Indiana, Erlanger and Lebanon, Kentucky, and Norwood, Ohio; and Lebanon, Lebanon Junction, New Haven, and Springfield, Kentucky)

MB Docket No. 04- 17 RM- 11113 RM- 11114

This procedure is set forth in Section 1.87 of the Commission's rules.

Comments
or alternatively Counterproposal - Petition For Rulemaking

Comes now Indiana Community Radio Corporation ("ICRC") and it's translator W283AJ Connersville, Indiana in the above noted matter. The Commission has requested comments and counter proposals. This filing is *supportive* of the PRM, and proposes a *Counter Proposal* to provide continued service . The Counter Proposal can be granted without adversely affecting the NPRM and provide first time Non Commercial service to the dual cities of Spiceland Indiana which has no aural service Licensed to it and Connersville, Indiana which will be left without an FM service Licensed to it as a result of the NPRM.

ICRC holds a Construction Permit for W283AJ at Connersville, Indiana. ICRC requests the Commission modify the Construction Permit from a Class D License on Channel 283 to a Class A License on Channel 285. ICRC would specify the Communities of License as the dual Communities of Spiceland/Connersville.

In support of the noted moves associated with the Rule Making which removes Service from Connersville, Indiana, ICRC proposes to place new service in Connersville and also provide new service for Spiceland, Indiana.

Channel 283 Connersville, Indiana to Channel 285A Spiceland/Connersville

ICRC applied for CH 2853AJ during a Commission Window and this window allowed other applicants to apply for facilities. No other applicants applied for Channel 283 at Connersville, Indiana. ICRC received a Construction Permit for the facilities.

A minor frequency change is proposed to change facilities from W283AJ to CH 285A. The 60dbu contours of the Non Commercial facility will cover both Spiceland and Connersville, Indiana. Connersville's only aural FM service will be reallocated to Norwood Ohio. The instant proposal is in the Public Interest.

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ICRC conducted numerous allocation studies to determine a frequency could be found which would leave Connersville with existing service and not be in conflict with the Proposed Rule Making Proceeding but compliment it.

Connersville is a small community and without aural FM service the Community will be adversely affected. Without coverage of local sports and community events Connersville residents will not have a local voice for these events. This instant proposal is in the Public Interest.

By using the Commission's Rules for Contour Protection in regards to WKOA Lafayette, Indiana the facilities can be proposed to meet separation distances required by the Commission's Rules for minimum Class A facilities.

ICRC proposes 6000 watt (6kw) operation at N 39-50-46.5 W 85-14-36.7 at 99.6 meters. 87,735 persons would have new service from this proposal. As the proposed communities are not in an urbanized area no Tuck showing is believed required.

Current Proposal

Community	Present	Proposed
Connersville, Indiana	262B	service deleted
Madison, Indiana	*266A	*265A
Richmond, Indiana	267B	267B1
Erlanger, Kentucky	265A	266A
Lebanon, Kentucky	265C3	-----
Lebanon Junction, Kentucky	297A	274A
New Haven, Kentucky	-----	297A
Norwood, Ohio	-----	262A
Springfield, Kentucky	274A	265A

Counterproposal or additional benefits of existing proposal


Community	Present	Proposed
Connersville, Indiana	262B	deleted
Connersville, Indiana	285A	NEW
Spiceland, Indiana	285A	NEW
Madison, Indiana	*266A	*265A
Richmond, Indiana	267B	267B1
Erlanger, Kentucky	265A	266A
Lebanon, Kentucky	265C3	-----
Lebanon Junction, Kentucky	297A	274A
New Haven, Kentucky	-----	297A
Norwood, Ohio	-----	262A
Springfield, Kentucky	274A	265A

Conclusion

The Counterproposal submitted by ICRC provides several benefits: 1) First time Aural Service for Spiceland, Indiana; 2) Continued Service for Connersville, Indiana protecting the local community ; 3) The proposal does not adversely affect any portion of the Proposed Rule Making but compliments it; and 4) Over 87,000 persons would receive new aural service; and 5) All the benefits are in The Public Interest and Neccessity.

Indiana Community Radio Corporation is one of a very few broadcast operations in the United States operated and headed by a female broadcaster. This move would uphold the Commission's attempts to provide a more diverse voice for our nation's broadcasters.

Based on the foregoing facts the ICRC Counterproposal is in the Public Interest.


Jennifer Cox-Hensley
WJCF

Declaration Of Jennifer Cox-Hensley

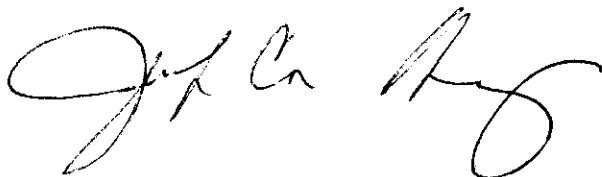
I am Jennifer Cox-Hensley. I have submitted a Counterproposal on behalf of Indiana Community Radio Corproation. I affirm under penalty of perjury that the statements herein to be true and correct.



Certificate of Service

A Copy of this Petition was mailed first class postage to :

The Federal Communications Commission, Office of the Secretary, 445 Twelfth Street, SW, TW- A325, Washington, D. C. 20554 9(original and 4 copies) . Additionally: Mark N. Lipp, Esq. John F. Garziglia, Esq. J. Thomas Nolan, Esq. Howard Barr, Esq. Scott Woodworth, Esq. Counsel for Washington County CBC, Inc. Counsel for Rodgers Broadcasting Corporation Elizabethtown CBC, Inc. and CBC of Marion Vinson & Elkins, LLP County, Inc. 1455 Pennsylvania Avenue, N. W. Womble Carlyle Sandridge & Rice, PLLC Washington, D. C. 20004 1401 Eye Street, N. W. Seventh Floor Washington, D. C. 20005 15.



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